



LBMA (THE LONDON BULLION MARKET ASSOCIATION) CERTIFICATION
(BASED ON ISO19011)

No.	Document	Remarks
STEP 1 - Establish strong company management systems 第一步 建立强大的管理系统		
1	Adopt a company policy regarding due diligence for supply chains of silver 银供应链尽职调查政策	Due diligence for all suppliers 供应商尽职调查报告
2	Set up an internal management structure to support supply chain due diligence 建立内部管理系统支持供应链的尽职调查	Compliance team and responsibility 合规调查小组并明确职责
3	Establish a strong internal system of due diligence, controls and transparency over silver supply chains, including traceability and identification of other supply chain actors 建立强大的内部尽职调查系统	<ul style="list-style-type: none"> • Supply chain traceability system 供应链追溯系统 • Maintaining records 记录 • Training 培训 • Compliance Officer 合规人员 • Payment through official banking channel 官方银行付款 • Cooperation with government authorities 政府授权合作
4	Strengthen company engagement with silver-supplying counterparties and, where possible, assist silver-supplying counterparties in building due diligence capacities 加强银供应商的合作，必要时，辅助他们建立尽职调查能力	•
5	Establish a confidential grievance mechanism 建立保密的投诉机制	•
STEP 2 - Identify and assess risk in the supply chain 第二步 识别和评估供应链风险		
1	Identify risks in the silver supply chain 银供应链风险识别	
2	Assess risks in light of the standards of their supply chain due diligence system 风险评估	Supply chain due diligence 供应链尽职调查 High Risk Supply Chains 高风险供应链 Monitoring of transactions 交易监督 Recognition of other certifications to demonstrate compliance with the LBMA due diligence requirements 公认的符合 LBMA 尽职调查要求的其他认证
3	Report risk assessment to designated Senior Management 向指定的高级管理者汇报风险评估	
STEP 3 - Design and implement a management strategy to respond to identified risks 第三步 设计和实施针对已识别风险的管理		
1	Report findings to designated Senior Management 向指定的高级管理者汇报发现点	
2	Devise a strategy for risk management of an identified risk by either (i) mitigation of the risk while continuing trade, (ii) mitigation of the risk	



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	while suspending trade or (iii) disengagement from the risk 对已识别风险的管理策略	
3	Where a management strategy of risk mitigation is undertaken, it will include measurable steps to be taken and achieved, monitoring of performance, periodic reassessment of risk and regular reporting to designated senior management.对风险管理措施 的测量、绩效、周期性复评以及定期报告	
STEP 4 - Arrange for an independent third-party audit of the supply chain due diligence 第四步 安排独立的第三方针对供应链尽职调查审计		
1	Auditor Requirements 审核员要求	
2	Audit Standards 审计标准	
3	Audit Procedures 审计程序	
4	Audit Report 审计报告	<ul style="list-style-type: none"> • ISO 19011:2011 • ISAE 3000
5	Audit Periodicity 审计周期	
6	Submission of Audit Report to LBMA 提交审计报告给 LBMA	
STEP 5 - Report on supply chain due diligence 第五步 供应链尽职调查报告		
1	ISO 19011:2011	
2	ISAE 3000	
3	Corrective Action Plan 整改措施	

EFFECTIVE DATE: Refiners shall apply this Guidance (version 1) for the annual period beginning on or after 1 January 2018. Earlier application is encouraged.